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Attorneys for Plaintiffs Gregory R. Raifman and  
 Susan Raifman, individually and as Trustees for the  
 Raifman Family Revocable Trust Dated 7/2/03,  
 and Gekko Holdings, LLC, an Alaska  
 limited liability company, dba Gekko Breeding and Racing

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

GREGORY R. RAIFMAN, individually and as  
 Trustee of the RAIFMAN FAMILY  
 REVOCABLE TRUST DATED 7/2/03, SUSAN  
 RAIFMAN, individually and as Trustee of the  
 RAIFMAN FAMILY REVOCABLE TRUST  
 DATED 7/2/03, and GEKKO HOLDINGS, LLC,  
 an Alaska limited liability company, dba GEKKO  
 BREEDING AND RACING,

Plaintiffs,

v.

CLASSICSTAR, LLC, a Utah limited liability  
 company, CLASSICSTAR FARMS, LLC, a  
 Kentucky limited liability company, BUFFALO  
 RANCH, a business entity form unknown,  
 GEOSTAR CORPORATION, a Delaware  
 corporation, S. DAVID PLUMMER, SPENCER  
 D. PLUMMER III, TONY FERGUSON,  
 THOMAS ROBINSON, JOHN PARROT,  
 HANDLER, THAYER & DUGGAN, LLC, an  
 Illinois Limited Liability Company, THOMAS J.  
 HANDLER, KARREN, HENDRIX, STAGG,  
 ALLEN & COMPANY, P.C., a Utah professional  
 corporation f/k/a KARREN, HENDRIX &  
 ASSOCIATES, P.C., a Utah professional  
 corporation, TERRY L. GREEN, and DOES 1-  
 1000 inclusive,

Defendants.

CASE NO. C 07-02552 MJJ

**REQUEST FOR ENTRY OF DEFAULT  
 AGAINST DEFENDANTS HANDLER,  
 THAYER & DUGGAN, LLC, AN ILLINOIS  
 LIMITED LIABILITY COMPANY, AND  
 THOMAS J. HANDLER**

1 TO: THE CLERK OF THE ABOVE-ENTITLED COURT:

2 Plaintiff GREGORY R. RAIFMAN, individually and as Trustee of the RAIFMAN FAMILY  
3 REVOCABLE TRUST DATED 7/2/03, SUSAN RAIFMAN, individually and as Trustee of the  
4 RAIFMAN FAMILY REVOCABLE TRUST DATED 7/2/03, and GEKKO HOLDINGS, LLC, an  
5 Alaska limited liability company, dba GEKKO BREEDING AND RACING, hereby requests that the  
6 Clerk of the above-entitled Court enter default in this matter against Defendants HANDLER,  
7 THAYER & DUGGAN, LLC, an Illinois Limited Liability Company, and THOMAS J. HANDLER,  
8 on the ground that said Defendants have failed to appear or otherwise respond to the Complaint within  
9 the time prescribed by the Federal Rules of Civil Procedure.

10 Plaintiff served the Complaint on Defendants as follows:

- 11 1. On behalf of Defendant HANDLER, THAYER & DUGGAN, LLC, an Illinois Limited  
12 Liability Company, Thomas Handler, Partner of HANDLER, THAYER & DUGGAN,  
13 LLC, an Illinois Limited Liability Company, located at 191 N. Wacker Drive, 23<sup>rd</sup>  
14 Floor, Chicago, Illinois 60606, was served on May 24, 2007. This service is evidenced  
15 by the proof of service of Summons on file with this Court and attached hereto as  
16 Exhibit "A."
- 17 2. Defendant THOMAS J. HANDLER was personally served at 191 N. Wacker Drive,  
18 23<sup>rd</sup> Floor, Chicago, Illinois 60606 on May 24, 2007. This service is evidenced by the  
19 proof of service of Summons on file with this Court and attached hereto as Exhibit "B."

20 The above-stated facts are set forth in the accompanying Declaration of Richard J. Idell, filed  
21 herewith.

22 IDELL & SEITEL LLP

23 Dated: July 9, 2007

By:

Richard J. Idell

Ory Sandel

Elizabeth J. Rest

24 Attorneys for Plaintiffs Gregory R. Raifman and Susan  
25 Raifman, individually and as Trustees for the Raifman  
26 Family Revocable Trust Dated 7/2/03, and Gekko  
27 Holdings, LLC, an Alaska limited liability company, dba  
28 Gekko Breeding and Racing

**PROOF OF SERVICE**

I am employed in the City and County of San Francisco, State of California in the office of a member of the bar of this court at whose direction the following service was made. I am over the age of eighteen years and not a party to the within action. My business address is Idell & Seitel 465 California Street, Suite 300, San Francisco, California 94104.

On July 9, 2007, I served the following document(s):

REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANTS HANDLER, THAYER & DUGGAN, LLC, AN ILLINOIS LIMITED LIABILITY COMPANY, AND THOMAS J. HANDLER

☒ by regular **UNITED STATES MAIL** by placing a true and correct copy in a sealed envelope addressed as shown below. I am readily familiar with the practice of Idell Seitel & Rutchik for collection and processing of correspondence for mailing. According to that practice, items are deposited with the United States Postal Service at San Francisco, California on that same day with postage thereon fully prepaid. I am aware that, on motion of the party served, service is presumed invalid if the postal cancellation date or the postage meter date is more than one day after the date of deposit for mailing stated in this affidavit.

☒ by **E-MAIL TRANSMISSION**, by electronically transmitting a true and correct copy of the document(s) in Adobe Acrobat format to the electronic mail addresses indicated below:

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*Attorney for Terry Green & Karren, Hendrix,  
Stagg, Allen & Company, P.C.*

Edward C. Duckers, Esq.  
Vanessa A. Imberg, Esq.  
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8 after the date of deposit for mailing stated in this affidavit.

9  
10 Thomas J. Handler  
11 Handler, Thayer & Duggan, LLC  
12 191 N. Wacker Drive, 23<sup>rd</sup> Floor  
13 Chicago, IL 60606

14 Handler, Thayer & Duggan, LLC  
15 191 N. Wacker Drive, 23<sup>rd</sup> Floor  
16 Chicago, IL 60606

17  
18 I certify and declare under penalty of perjury under the laws of the State of California that the  
19 foregoing is true and correct and I executed this declaration at San Francisco, California.  
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30   
31 Suzanne Slavens